

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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SIMO HOLDINGS INC.

Plaintiff,

CIVIL ACTION NO. 18CV5427 (JSR)

-v-

HONG KONG UCLOUDLINK NETWORK
TECHNOLOGY LIMITED, AND
UCLOUDLINK (AMERICA), LTD.

Defendants.

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**DECLARATION OF PETER E. SOSKIN IN SUPPORT OF
PLAINTIFF SIMO HOLDINGS INC.'S OPPOSITION TO
DEFENDANTS' MOTIONS IN LIMINE**

I, PETER E. SOSKIN, declare that the following is true and correct:

1. I am an associate at K&L Gates, LLP, counsel to Plaintiff SIMO Holdings Inc. ("SIMO") in this action. I am admitted *pro hac vice* to practice in this Court, and I am familiar with the facts and circumstances set out herein. I submit this Declaration in support of SIMO's Opposition to Defendants' Motions *In Limine*.

2. Attached hereto as **Exhibit 1** is a true and correct copy of excerpts of the deposition transcript of Paul Clark, taken in this matter on February 15, 2019.

3. Attached hereto as **Exhibit 2** is a true and correct copy of excerpts of the deposition transcript of Eric Welch, taken in this matter on February 11, 2019.

4. Attached hereto as **Exhibit 3** is a true and correct copy of excerpts of the deposition of Christopher Martinez, taken in this matter on February 5, 2019.

5. Attached hereto as **Exhibit 4** is a true and correct copy of Chinese Patent No. CN105491555A, Bates No. SIMO_0264812-SIMO_0264825.

6. Attached hereto as **Exhibit 5** is a true and correct copy of the document produced at Bates No. UCLOUDLINK0043869–879.

7. Attached hereto as **Exhibit 6** is a true and correct copy of excerpts of the deposition transcript of Wang Bin’s Deposition taken in this matter on November 12, 2018.

8. Attached hereto as **Exhibit 7** is a true and correct copy portions of the Expert Report of John Hansen.

9. Attached hereto as **Exhibit 8** is a true and correct copy of excerpts of the deposition transcript of John Hansen, taken in this matter on February 13, 2019.

10. Attached hereto as **Exhibit 9** is a true and corrected copy of the email sent by Samuel Steinbock-Pratt to the parties dated March 1, 2019.

11. Attached hereto as **Exhibit 10** is a true and corrected copy of excerpts of the stricken supplemental expert report of Defendants’ Expert Martin J. Feuerstein.

12. Attached hereto as **Exhibit 11** is a true and correct copy of ABA Draft Model Patent Jury Instr., No. 10.1 (September 2011).

13. Attached hereto as **Exhibit 12** is a true and correct copy of , FCBA Model Patent Jury Instr., No. 4.1 (May 2014)

14. Attached hereto as **Exhibit 13** is a true and correct copy of IPO Model Design Patent Jury Instr., No. 9.19 (August 19, 2010).

15. Attached hereto as **Exhibit 14** is a true and correct copy portions of the File History of U.S. Patent No. 8,116,735.

I declare under penalty of perjury under the laws of the United States of America (28 U.S.C. § 1746) that the foregoing is true and correct.

Dated: April 24, 2019

At: San Francisco, California

/s/ Peter E. Soskin

PETER E. SOSKIN, ESQ.